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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

ILIO'ULAOKALANI COALITION,	)	CIVIL NO.04-00502 DAE BMK
a Hawai'i, nonprofit corporation;	)	
NA IMI PONO, a Hawaii	)	FEDERAL DEFENDANTS' FIRST
	)	SUPPLEMENTAL RESPONSE
unincorporated association; and	)	TO PLAINTIFFS' FIRST SET OF
KIPUKA, a Hawai'i unincorporated	)	INTERROGATORIES AND REQUEST
association,	)	FOR PRODUCTION OF DOCUMENTS
	)	AND THINGS
Plaintiffs,	)	
v.	)	
	)	
DONALD H. RUMSFELD, Secretary of	)	
United States Department of	)	
Defense; and Francis J. Harvey,	)	
Secretary of the United States	)	
Department of the Army,	)	
	)	
Defendants.	)	

**EXHIBIT 2**

Subject to and without waiving each of its General Objections, i.e. asserting each such objection for each Response set forth below as if fully stated therein, the United States responds to the Interrogatories as follows:

INTERROGATORY NO. 5: Please describe with particularity each Stryker-specific training exercise you contend the 2<sup>nd</sup> Brigade must conduct in Hawai'i to be mission deployable as an SBCT, including, but not limited to, a description, with respect to each exercise, of the number of days the exercise would last, the number of soldiers that would participate, the number and type of weapons that would be employed, the surface danger zones for the weapons that would be employed with respect to the range or other location where the weapons would be used, the number and type of munitions that would be expended, the number and type of Stryker vehicles that would participate, and the ranges or other locations where each exercise would take place.

FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 5:

Subject to and without waiving the foregoing objections, the United States supplements its response to Interrogatory 5 as follows:

The SDZ for Range 1 at PTA was not provided because no Stryker-specific weapons firing will occur at this range. It will all be dismounted infantry-squad firing. This range was

listed in the initial response because Strykers will transport the squads to the range as part of the training scenario prior to them dismounting, simulating arrival at or near an objective. Range 10 is a live fire maneuver range with the SDZ developed for each exercise prior to its commencement. No SDZs were provided for the 120 mm mortar firing points because SDZs are not generally developed for mortars. Firing data, which shows left and right firing limits, is developed by the mortar teams shortly before firing and plotted on their maps at that time. The SDZs for Ranges 8 and 8b are within the boundaries of the PTA Impact area. To clarify our initial response, Strykers use of Range 20 will not involve any off-road maneuver or any Stryker-specific live-fire training.

No SDZs were produced for Ranges KR-4, 5, and 6 at Schofield Barracks because the only Stryker-specific training will involve blank ammunition and not live fire. The SDZ for the Mark 19 at QTR 1 is subsumed within the SDZ provided for the .50 Caliber machine gun. The Stryker vehicles will not conduct moving live-fire at QTR 1, only static live- fire using the previously provided SDZs.

Kahuku Training Area (KTA). Stryker maneuver in KTA is limited to exiting road operations except in those areas designated for Stryker off road maneuver listed in Figure 2-5 of

the May 2004, Final Environmental Impact Statement (EIS), for the Transformation of the 2<sup>nd</sup> Brigade, 25<sup>th</sup> Infantry Division (Light) to a Stryker Brigade Combat Team (2/25 SBCT) in Hawaii. The critical tasks related to 2/25 SBCT Initial Operating Capacity (IOC) training proposed in KTA are limited to the designated larger sections of Stryker Maneuver areas in training areas A1, B2 and C1 as depicted in the Kahuku Training Area map produced below. This training would be conducted by SBCT infantry platoons, company or the battalion headquarters using assigned Stryker and other vehicles to move by convoy to the KTA using the public highway and entering KTA by either Alpha or Charlie gates. They would move by road to the designated maneuver areas within training areas A1, B2, or C1 and conduct training. Communications would be maintained with the battalion or brigade headquarters and Range Control. The specific SBCT tasks accomplished in those areas which require the use of the Stryker vehicle are the following collective training tasks: cordon search, movement to contact, deliberate attack, react to ambush, and recovery operations. The unit would train two to fourteen days per exercise and return to Schofield Barracks. No live ammunition is used for training.

a. Cordon search is a task were dismounted and mounted soldiers will be looking for simulated intelligence, enemy

combatants, ambushes and potential lanes for advance while in a defense observation posture. This task uses one to thirty Strykers to move between locations and support dismounted infantry by providing rapid movement between locations by transportation, increased observation using improved sights, increased communications and data transfer using more powerful equipment, accurate over watching simulated fire power in case of enemy engagement, and act as ballistic protection for simulated enemy engagements. Stryker would normally follow dismounted troops as they advance.

b. Movement to contact is a task where dismounted and mounted soldiers will be advancing and seeking enemy combatants to engage while in a offense posture. This task uses four to thirty Strykers to move between locations and support mounted and dismounted infantry by providing rapid movement between locations, increased observation, increased communications and data transfer, accurate over watching simulated fire power, and act as ballistic protection for simulated enemy engagements. Stryker would carry mounted troops forward or follow dismounted troops as they advance.

c. Deliberate attack is a task were dismounted soldiers will be attacking the location of simulated enemy combatants to engage and over come while in a offense posture. This task uses

one to thirty Strykers to move to specific locations and support mounted and dismounted infantry by providing increased observation, increased communications and data transfer, accurate over watching simulated fire power, and act as ballistic protection for simulated enemy engagements. Stryker would follow dismounted troops as they advance.

d. React to ambush is a task where dismounted and mounted soldiers will be moving along lanes of advance while in a defense posture. This task uses one to thirty Strykers to move between locations and support infantry by providing increased observation, increased communications and data transfer, providing accurate over watching simulated fire power, and act as ballistic protection for simulated ambushes. Stryker would carry mounted troops forward or follow dismounted troops as they advance.

e. Recovery operations is a task where dismounted and mounted soldiers and vehicles are held in a defense posture and need to be evacuated due to various reasons to safe locations under enemy fire. This task uses one to thirty Strykers to assist in moving personnel, equipment or simulated disabled vehicles to reward locations and support by providing recovery teams and equipment with increased observation, increased communications and data transfer, accurate over watching



simulated fire power, act as ballistic protection for simulated ambushes and self recover disabled vehicles. Stryker would carry mounted troops or follow dismounted troops as they advance or retrograde.

Dillingham Training Area (DTA). Stryker maneuver in DTA is limited to exiting road operations except in those areas designated for Stryker off road maneuver listed in Figure 2-4 of the May 2004, Final EIS, for the Transformation of the 2/25 SBCT in Hawaii. These maneuver areas are made up of ether existing roads, old airfield taxiways, aircraft parking areas or Nike air defense previously disturbed areas. The critical tasks related to 2/25 SBCT Initial Operating Capacity (IOC) training proposed in DTA are limited to the designated sections of Stryker Maneuver areas in training areas P1, P2 and P3 as depicted on the Dillingham Training Area map produced below. This training would be conducted by SBCT Brigade Support Battalion (BSB) using assigned non-Stryker vehicles to move by convoy to the DTA using the public highway and entering DTA by the eastern public gate. They would move by road around the current runway to the designated maneuver areas in one of the three training areas and conduct training. Communications would be maintained with the battalion or brigade headquarters and Range Control. The specific SBCT tasks accomplished in those areas only require the

use of the Stryker vehicle which have been recovered for scheduled or unscheduled maintenance tasks or due to recovery operations. No Strykers are assigned to the BSB. No Stryker maneuver will be done within DTA except to enter and exit and movement to maintenance locations. The unit would train two to fourteen days per exercise and return to Schofield Barracks. No live ammunition is used for training.

East Range (ER) Training Area. Stryker maneuver in ER is limited to exiting road operations except for minor turn around and pull off and in those areas designated for Stryker off road maneuver listed in Figure 2-3 of the May 2004, Final EIS, for the Transformation of the 2/25 SBCT in Hawaii. The critical tasks related to 2/25 SBCT Initial Operating Capacity (IOC) training proposed in ER are limited to the designated Stryker Drivers Training Course and adjacent areas as depicted on the East Range Stryker Off-Road Go and No-Go Areas map produced below and is for initial drivers training of one Stryker at a time for up to three hours daily during Operation New Equipment Training (OPNET).

REQUEST FOR PRODUCTION NO. 5: Please identify and produce all documents that support, contradict, discuss or are in any way related to your response to Interrogatory No. 5, including, but not limited to, any schedules for Stryker-specific training and

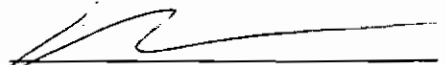


any maps of ranges or other locations where you propose to conduct Stryker-specific training.

FIRST SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO.5:

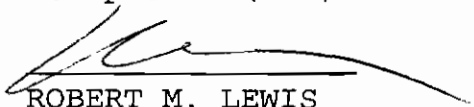
Subject to and without waiving the foregoing objections, the United States responds to Request for Production 5 by producing the following documents:

- Kahuku Training Area map.
- Dillingham Training Area map.
- East Range Stryker Off-Road Go and No-Go Areas map.

  
Robert M. Lewis  
Attorney for Objections

Respectfully submitted this 28<sup>th</sup> day of November, 2006.

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